

EXHIBIT A TO SUBPOENA

Harvard Environmental, Inc., shall designate one or more officers, directors or managing agents, or other persons who consent to testify, on its behalf, as to matters known or reasonably available to the organization with respect to the following areas:

1. The scope of work and cost of remediating mold, asbestos and other conditions at the apartment complex now known as Fenwick Park Apartments (the "Apartments") located at 1410 Cypress Avenue, Elsmere, Delaware.
2. Performance of the remediation and renovation contract(s) between Harvard Environmental, Inc. and the owners of the Apartments.
3. Costs incurred, spent or billed to address Town Code violations at the Apartments.

DOCUMENT REQUESTS

4. All reports or other documents concerning inspections or site visits performed by Harvard Environmental, Inc., or any other entity, at the apartment complex known as the Fenwick Park Apartments (the "Apartments") located at 1410 Cypress Avenue, Elsmere Delaware, for all such inspections or visits that occurred after September 2002.
5. All reports, memos, notes, letters, documents (including electronic documents, such as email) or other communications of any type, authored or received by Harvard Environmental, Inc., concerning the costs incurred, spent or billed to address Town Code violations at the Apartments.
6. Any data or other documents evidencing results of testing performed at or in connection with the Apartments, including, but not limited to, any documents referring to such testing or assessments of moisture, mold, asbestos or airborne contaminants at the Apartments.

7. All reports, memos, notes, letters, documents (including electronic documents, such as email) or other communications of any type, authored or received by Harvard Environmental, Inc., concerning the presence of moisture, mold, asbestos or airborne contaminants at the Apartments.

8. All logs, field notes and any other recordings reflecting observations of Harvard Environmental, Inc., or any other person or entity, at or relating to the Apartments.

9. Any photographs, including digital representations, of the Apartments.

10. All notes or other documents reflecting any communications between Harvard Environmental, Inc., and any other person or entity concerning the Apartments, its tenants or moisture, mold, asbestos or airborne contaminants at the Apartments.

11. All reports, memos, notes, letters, documents (including electronic documents, such as email) or other communications of any type, authored or received by Harvard Environmental, Inc., concerning any local code or ordinance violations and responsive corrective measures undertaken at the Apartments.